

NL INDUSTRIES/TARACORP SUPERFUND SITE GROUP

**Leed Environmental, Inc.
Van Reed Office Plaza
2209 Quarry Drive, Suite C-35
Reading, PA 19609
Telephone: (610) 670-7310
Facsimile: (610) 670-7311**

U.S. EPA RECORDS CENTER REGION 5



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April 8, 2016

By Electronic Mail and First Class Mail

Ms. Sheri L. Bianchin
Remedial Project Manager
Institutional Controls Coordinator
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, IL 60604

**Re: NL Industries/Taracorp Superfund Site; Granite City, Illinois
Consent Decree – Quarterly Progress Report 41 (January-March 2016)**

Dear Ms. Bianchin:

As required by the Consent Decree for the NL Industries/Taracorp Superfund Site (the “site”), two copies of this letter are submitted, on behalf of the NL Industries/Taracorp Superfund Site Group (“Group”), to provide the U.S. Environmental Protection Agency (“EPA”) with a quarterly progress report for the Supplemental Environmental Project (“SEP”), operation and maintenance, and other activities that were performed during the period from January-March 2016.

1. Actions Taken During Previous Quarter to Comply with the Consent Decree:

- **SEP:** The Madison County Community Development (“MCCD”) continued to seek additional applicants for participation in the SEP. During the January-March 2016 period, MCCD completed risk assessments at two properties, signed abatement contracts for two properties, and completed abatement and clearance activities at one property. For the project to date, mitigation and clearance testing have been performed and determined by MCCD to be completed at 123 properties located within the boundaries of the site. The Group notified MCCD in March 2016 that EPA will not extend the SEP completion date beyond March 8, 2017. The Group and MCCD also initiated efforts to prepare a SEP Completion Report.
- **Residential Soil Remediation and Sidewalk Remediation:** During January 2016, the Group’s contractor, Environmental Works, Inc. (“EWI”), completed restoration activities (sod installation, etc.) along the new sidewalk on the 1555 State Street property in Granite City. EWI initiated efforts to prepare a report to document the results of residential soil remediation and sidewalk remediation activities performed from August 2015 to January 2016.
- **Operation and Maintenance:** During the January-March 2016 period, the following operation and maintenance activities were performed at the site:

February 22	The Group authorized Munie Greencare Professionals ("Munie") to perform vegetation control and mowing services on the properties at 16 th Street and State Street in Granite City in 2016.
March 3	In response to a request from EPA, the Group's project coordinator sent an email to EPA's project manager to provide a copy of the June 2002 Operation and Maintenance Plan for the site. In the email, the Group's project coordinator advised EPA's project manager that the Group had voluntarily expanded the scope of the June 2002 Operation and Maintenance Plan to address the inspections and maintenance of the warning signs that had been fabricated and affixed to the fence at the main industrial site and to address inspections of several additional sites where EPA's remedial action reports indicated that lead-impacted soil and/or battery case chips may have been left in place upon completion of remedial activities.

- **Project Coordination:** During the January-March 2016 period, the Group's project coordinator communicated with the following parties regarding work at the site:

January 6	Sent an email, in response to an inquiry from EPA's project manager, to advise EPA that EWI's landscaping subcontractor postponed work at the site during the previous week due to heavy rain but that preparatory work, including topsoil placement, had resumed at the 1555 State Street property in preparation for sod installation.
January 7	Issued SEP Quarterly Progress Report 12, prepared by MCCD, to EPA.
January 7	Sent an email to EPA's project manager regarding the distribution list for project-related documents.
January 7	Sent an email, in response to a request from EPA's project manager, to provide a copy of the Master List for Stack Emissions Properties.
January 8	Submitted Quarterly Progress Report 40 to EPA.
January 14	Sent an email to Illinois EPA's representative in regard to the construction of the sidewalk along the 1555 State Street property.
January 20	Sent an email to EPA's project manager to provide a copy of the Master List of Stack Emissions Properties, including the property key which had been inadvertently deleted on the last page of the document sent to EPA on January 7.
January 20	Participated with Group representatives in a conference call with EPA.
February 24	Participated with Group representatives in a conference call with EPA.
March 3	In response to a request from EPA, the Group's project coordinator sent an email to EPA's project manager to provide a copy of the June 2002 Operation and Maintenance Plan for the site. In the email, the Group's project coordinator advised EPA's project manager that the Group had voluntarily expanded the scope of the June 2002 Operation and Maintenance Plan to address the inspections and maintenance of the warning signs that had been fabricated and affixed to the fence at the main industrial site and to address inspections of several additional sites where EPA's remedial action reports indicated that lead-impacted soil and/or battery case chips may have been left in place upon completion of remedial activities.

March 3	Received an email from EPA's attorney which included a copy of the letter that EPA's civil investigators delivered to the owners of residential properties at the site to seek access for soil sampling and remediation if necessary.
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2. **Summary of Data and/or Results of Sampling and Tests Received:**

- Not applicable for this reporting period.

3. **Work Plans, Plans, and Other Deliverables Completed and Submitted to EPA During the Previous Quarter:**

- As discussed with EPA during the February 24, 2016 conference call, the Group initiated efforts to prepare a memorandum to document the efforts previously taken by the Group and EPA to implement the contingency measures requirements at the site.

4. **Actions, Data Collection, and Implementation of Work Plans and Other Information Related to the Progress of Construction which are Scheduled to be Performed During the Next Six-Week Period:**

- At the present time, the Group will complete its contingency measures memorandum and submit the memorandum to EPA in April 2016. The Group will respond to questions or comments on the memorandum, if any are received from EPA.
- The Group and its remedial contractor, EWI, anticipate that a final inspection will be held at the site with EPA and Illinois EPA in regard to the residential soil remediation and sidewalk remediation activities performed at the site from August 2015 to January 2016. EWI will continue to prepare a final report.
- The Group and MCCD will continue to prepare a SEP Completion Report.
- The Group will continue to perform operation and maintenance activities at the site.
- The Group will continue efforts with EPA and City of Venice representatives to prepare a roadways ordinance.
- The Group will address comments, if any are received from EPA, in regard to the Five-Year Review Groundwater Monitoring Report, which was submitted to EPA on August 11, 2014 to summarize the results of the April 2014 groundwater monitoring event.
- The Group will address comments, if any are received from EPA, in regard to the Soil Sampling and Analysis Report, which was submitted to EPA in January 2014 to document the results from soil sampling activities at 73 residential properties in April – May 2011, September 2012, June 2013, and October 2013. The Group will also address comments, if any are received from EPA, in regard to the Soil Sampling and Analysis Report Addendum, which was submitted to EPA on December 17, 2015 to document the results of soil sampling performed on three residential properties (1011 McCambridge, 1121 Reynolds, and 2222 Edison) in June 2015 and one residential property (2112 Missouri Avenue) in November 2015.

- Upon receipt of EPA's comments, the Group will continue to prepare and finalize the draft environmental covenant, the draft Institutional Controls Work Plan, and the draft Communication Plan for Venice Alleys.
- Upon receipt of EPA's approval of the scope of the one-call notification program, the Group will finalize a services agreement, retain a contractor, and begin to implement the one-call notification program.
- MCCD will continue to implement the SEP and seek additional participants in the SEP. The Group will provide copies of MCCD's progress reports to EPA on a quarterly basis.
- The Group will respond to EPA's comments, if any are received, on Addendum 1 to the SEP Work Plan, which was issued to EPA on November 11, 2011, to request EPA's approval of the procedure to be used by MCCD for soil sampling within the drip zones of homes being addressed as part of the SEP.
- The Group will continue to work with EPA to develop a program for institutional controls at the site and will continue to update EPA with periodic status reports and during conference calls.

5. **Problems Encountered, Anticipated Problems, Actual or Anticipated Delays, and Efforts Developed or Implemented to Mitigate Delays:**

- As previously reported, the level of public participation in the SEP has been less than originally anticipated by the MCCD. The MCCD will continue efforts to attempt to obtain additional participation. The Group will continue to advise EPA regarding MCCD's efforts and schedule.
- During September 2015, two property owners who previously granted access for soil remediation decided that they did not want soil remediation to be performed on their properties. The Group will continue to discuss this matter with EPA.

6. **Modifications to Work Plans or Schedules Proposed to EPA or Approved by EPA:**

- As previously reported, the Group sent a letter to EPA on February 17, 2014 to seek an extension of the SEP completion date from March 8, 2014 to March 8, 2017. The Group was advised by EPA during the January-March 2016 period that the SEP extension has been approved but that the SEP completion date will not be extended beyond March 8, 2017.

7. **Community Relations Activities During Previous Month or to be Undertaken During Next Six-Week Period:**

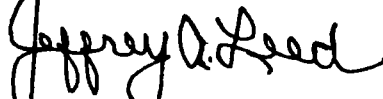
- As indicated above, the MCCD is continuing to attempt to encourage other homeowners to participate in the SEP.

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Should you or your staff have questions or comments regarding this progress report, please contact this office at (610) 670-7310.

Very truly yours,

LEED ENVIRONMENTAL, INC.

A handwritten signature in black ink, appearing to read "Jeffrey A. Leed". The signature is fluid and cursive, with the first name "Jeffrey" being more prominent.

Jeffrey A. Leed
Project Coordinator

cc: Nicole Wood, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Christopher Grubb, Esq. – U.S. Environmental Protection Agency (by electronic mail)
Ms. Erin Rednour - Illinois EPA (by electronic mail and first class mail)
Mr. Tom Miller – Illinois EPA (by electronic mail)
Technical Committee, NL Industries/Taracorp Superfund Site Group (by electronic mail)